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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

LISA VIZCARRA, individually and on behalf  
of all others similarly situated,

Case No. 4:20-cv-02777-YGR

**STIPULATION AND [PROPOSED]  
ORDER RE MOTION BRIEFING**

## Plaintiffs.

V.

## UNILEVER UNITED STATES, INC..

Defendant.

1           The parties to the above-entitled action jointly submit this stipulation and proposed order  
2 as follows:

3           WHEREAS, Plaintiff filed a renewed motion for class certification on June 17, 2022,  
4 whose hearing date is set for September 27, 2022;

5           WHEREAS, the parties have conferred on a mutually acceptable briefing schedule for  
6 Plaintiff's motion, to allow for sufficient time for the parties to brief the motion;

7           WHEREAS, in the conferral, the parties agreed that Unilever's date to oppose the  
8 renewed motion for class certification should be August 16, 2022, and that Plaintiff's reply brief  
9 on its motion to strike should be September 6, 2022;

10           WHEREAS, the parties having conducted this conferral prior to Plaintiff filing her  
11 motion, the existing noticed hearing date of September 27, 2022, does not need to be changed;

12           WHEREAS, these briefing deadlines would impact no other deadlines in the case, as a  
13 schedule for general discovery and summary judgment is not yet in place;

14           NOW THEREFORE, the parties stipulate and respectfully request that the Court order the  
15 following:

- 16           1. Unilever's date to oppose Plaintiff's renewed motion for class certification shall be  
17           August 16, 2022;
- 18           2. Plaintiff's date to submit a reply brief on its renewed motion for class certification shall be  
19           September 6, 2022; and
- 20           3. The present hearing date of September 27, 2022, for Plaintiff's motion for class  
21           certification, shall remain unchanged, or set to such other date as suits the Court.

1  
2 SO STIPULATED AND AGREED TO BY THE FOLLOWING ON July 28, 2021:  
3

4 **REESE LLP**

5 */s/ Sue J. Nam*  
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2 **LOCAL RULE 5-1(i)(3) ATTESTATION**  
3

4 I, August T. Horvath, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that the  
concrecence to the filing of this document has been obtained from each signatory hereto.  
5

6 DATED: June 21, 2022  
7

By: /s/August T. Horvath  
August T. Horvath  
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Counsel for Defendant Unilever United States,  
Inc.  
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1 **[PROPOSED] ORDER**

2 Based upon the stipulation of the parties and for good cause shown, IT IS ORDERED  
3 THAT THE SCHEDULE IS REVISED AS FOLLOWS:

4

5     • Unilever's opposition to Plaintiff's renewed motion for class certification due by  
6         August 16, 2022;

7     • Plaintiff's reply brief on its renewed motion for class certification due by September 6,  
8         2022.

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10 Dated: June 27, 2022

  
11 Honorable Yvonne Gonzalez Rogers

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